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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAY 08 2007

at 12 o'clock and 30 min. P.M. 5
SUE BEITIA, CLERK

LODGED

MAY 04 2007
CLERK, U.S. DISTRICT COURT
DISTRICT OF HAWAII

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CADE OYADOMORI and RANAE)	CIVIL NO. 06-00666 (JMS/KSC)
AWAKUNI, on behalf of themselves))	(Class Action Complaint)
and all others similarly)	
situated in the State of Hawaii,))	
Plaintiffs,)	PLAINTIFFS' EX PARTE MOTION TO
vs.)	UNSEAL THE COMPLAINT FILED
)	DECEMBER 15, 2006 AND TO
)	CORRECT NAMING OF PLAINTIFF
)	RANAE AWAKUNI TO RENAE
CYPRESS SEMICONDUCTOR)	AWAKUNI; AFFIDAVIT OF KUNIO
CORPORATION; FUJITSU AMERICA,)	KUWABE; ORDER GRANTING
INC.; FUJITSU LIMITED, INC.;)	PLAINTIFFS' EX PARTE MOTION TO
HITACHI AMERICA LTD.; HITACHI)	UNSEAL THE COMPLAINT FILED
LTD.; HYNIX SEMICONDUCTOR)	DECEMBER 15, 2006 AND TO
AMERICA INC.; HYNIX)	CORRECT NAMING OF PLAINTIFF
SEMICONDUCTOR INC.; MATSUSHITA)	RANAE AWAKUNI TO RENAE AWAKUNI
ELECTRIC INDUSTRIAL CO., LTD.,)	
d/b/a PANASONIC; SEMICONDUCTOR)	
COMPANY, MATSUSHITA ELECTRIC)	
INDUSTRIAL CO., LTD.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.,)	
d/b/a CRUCIAL TECHNOLOGY;)	
MICRON TECHNOLOGY, INC.;)	
MITSUBISHI ELECTRIC &)	
ELECTRONICS USA, INC.;)	
MITSUBISHI ELECTRIC CORPORATION;))	

NEC ELECTRONICS AMERICA, INC.;)
 NEC ELECTRONICS CORPORATION;)
 RENESAS TECHNOLOGY AMERICA,)
 INC.; RENESAS TECHNOLOGY CORP.;)
 SAMSUNG ELECTRONICS COMPANY)
 LTD.; SAMSUNG SEMICONDUCTOR,)
 INC.; SONY CORPORATION; SONY)
 CORPORATION OF AMERICA; SONY)
 ELECTRONICS, INC.; TOSHIBA)
 AMERICA CORPORATION; TOSHIBA)
 AMERICA ELECTRONIC COMPONENTS;)
 TOSHIBA CORPORATION; and JOHN)
 DOE 1 through 100;)
)
 Defendants.)
)

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 Complaint.wpd

PLAINTIFFS' EX PARTE MOTION TO UNSEAL THE COMPLAINT
 FILED DECEMBER 15, 2006 AND
TO CORRECT NAMING OF PLAINTIFF RANAE AWAKUNI TO RENAE AWAKUNI

Plaintiffs CADE OYADOMORI and RANAE AWAKUNI, by and through their attorneys, HISAKA YOSHIDA & COSGROVE, move this court ex parte for an entry of an Order Granting Plaintiffs' Ex Parte Motion to Unseal the Complaint Filed December 15, 2006 and to Correct Naming of Plaintiff Ranae Awakuni to Renae Awakuni.

As required under H.R.S. § 480-13.3, Plaintiffs submitted the sealed Complaint and supporting materials to the Attorney General of the State of Hawaii for the statutorily mandated review. The statutory review period of 60 days under H.R.S. § 480-13.3 expired on or about February 13, 2007; however, as stated in Plaintiffs' Ex Parte Motion to Extend Time for Service of Summons and Complaint Filed April 11, 2007, the


Attorney General's office does not believe that the statutory period for its review had started to run.

Nonetheless, Plaintiffs' counsel and the Attorney General's office have conferred regarding its statutory review of this class action Complaint. And the Attorney General's office has agreed to allow Plaintiffs' counsel to proceed with this class action Complaint subject to its right to intervene as allowable under Hawaii law and further review of the class action Complaint. Therefore, at this time, the Attorney General of the State of Hawai'i has declined to proceed with the action or to file its own action involving the same or similar claim or claims set forth in the Complaint filed herein. Therefore, Plaintiffs request that the Court unseal the Complaint pursuant to H.R.S. § 480-13.3.

Plaintiffs also seek to correct the misnaming of Plaintiff RANAE AWAKUNI and amend her name as RENAE AWAKUNI.

The motion is supported by the attached Affidavit of Kunio Kuwabe.

DATED: Honolulu, Hawaii, MAY 04 2007.


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